

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

United State of America,

Case No. 3:24-cr-95

Plaintiff,

v.

**DEFENDANT'S MOTION FOR
FURLough**

Ryan W. Baron,

Defendant.

COMES NOW Defendant, Ryan Baron ("Mr. Baron"), by and through his attorney, Luke T. Heck, and hereby moves the Court for temporary one-month furlough to allow Mr. Baron to address personal necessities and seek employment.

Mr. Baron has been in federal custody since June 20, 2024, with an anticipated trial date of October 7, 2025. Since Mr. Baron self-surrendered himself upon learning of this indictment, he has exhibited exemplary behavior with no record of incident while in custody. Prior to federal custody, Mr. Baron was facing similar charges in Griggs County, North Dakota. Those charges were dismissed due to the indictment in this matter. During pretrial release in the Griggs County matter, he was released on bond and abided by all conditions of his pretrial release without incident. Mr. Baron has been present for all court appearances, has been in regular contact with his counsel, and has not had any previous violations of release while in custody on this matter.

Mr. Baron requests a furlough for one month to clear up personal matters including taking care of personal finances, taxes, property, seek medical care for December, 2023 post-surgery follow-up, and to seek temporary employment.

Mr. Baron will work diligently to become employed and would be willing to take on any employment he can find. He desires employment to earn money to pay prior financial responsibilities and save money for his return to custody for purchase of personal hygiene and other personal items while in custody.

Mr. Baron's parents and siblings live in the Alexandria and St. Cloud, Minnesota areas. He would reside with his parents during furlough in Long Prairie, Minnesota. Further, he would participate in electronic home monitoring for the duration of the furlough and the use of any computers or electronic devices for accessing anything beyond seeking employment would be prohibited.

Mr. Baron will provide the Court with his parent's names, address, and telephone numbers. His parents names are Doris and Randy Baron, and an address can be provided at the request of the Court. His parents will be responsible for transportation to and from Tri-County Community Corrections in Crookston, Minnesota.

Mr. Baron understands and respects the seriousness of the charges before him. For the aforementioned reasons, he requests a one-month furlough to complete personal responsibilities and to earn money for paying for jail commissary (phone cards, personal hygiene, shoes, etc.) during which he would be compliant with electronic home monitoring, would not use computers or other electronic devices to access any social media platforms, would keep regular contact with his attorney, and also comply with any other conditions as the Court may deem appropriate.

Mr. Baron acknowledges that any violation of these conditions may result in new charges or an additional term of imprisonment.

The government objects to Mr. Baron's request for furlough.

Dated this 17th day of June, 2025.

VOGEL LAW FIRM

/s/ Luke T. Heck

BY: Luke T. Heck (#08133)
218 NP Avenue
PO Box 1389
Fargo, ND 58107-1389
Telephone: 701.237.6983
Email: lheck@vogellaw.com
ATTORNEYS FOR DEFENDANT